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Venture Capital and Due Diligence

Honorable Nicholas Garaufis  
United States District Judge  
U.S. District Court  
225 Cadman Plaza East  
Brooklyn, New York, 11201

Re: Zaxcom, Inc., v. Lectrosonics, Inc., Case No. 1:17-cv-03408-NGG-RER

Dear Judge Garaufis:

We represent Defendant Lectrosonics, Inc. in the above-referenced matter. I write in response to a request, conveyed by your law clerk a week ago, that the parties review Plaintiff Zaxcom, Inc.'s Amended Complaint, which was filed under seal, to determine whether the parties would agree that there was no longer a need to treat any of the contents of that pleading as confidential. I gather your request was prompted by consideration of the motion to dismiss for improper venue, or in the alternative to transfer, that is pending before the Court, and that it might facilitate or otherwise impact the Court's rendering decision on that motion.

Initially, I apologize for not having been able to more promptly respond to your request. The lawyers needed to consult with one another, and then with their clients, before we could respond to your request. We have done so, and are in agreement that Plaintiff's Amended Complaint, contains no information that either party requires to be kept confidential, and that Plaintiff's Amended Complaint may be unsealed and be part of the public record.

I have been authorized by Plaintiff's counsel to represent Plaintiff's concurrence with respect to the content of this letter, and to so indicate by showing the signature of Plaintiff's

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counsel, as well as myself and co-counsel for Defendant in this matter.

Respectfully submitted,

FOR LECTROSONICS, INC.

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By: /JLS/

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